

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>RAHEEM MARSHALL</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1951(a) (conspiracy to</b>
	<b>:</b>	<b>interfere with interstate commerce by</b>
	<b>:</b>	<b>robbery - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1951(a) (interference with</b>
	<b>:</b>	<b>interstate commerce by robbery -</b>
	<b>:</b>	<b>6 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (carrying and using</b>
	<b>:</b>	<b>a firearm during a crime of violence -</b>
	<b>:</b>	<b>6 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, the following businesses operating in Philadelphia, Pennsylvania, were engaged in interstate commerce:

- a. Sunoco A-Plus, 100 W. Queen Lane;
- b. Amoco Gas Station, 5570 Rising Sun Avenue;
- c. Coastal Gas Station, 4524 Germantown Avenue;
- d. Sunoco Gas Station, 1300 North Broad Street; and
- e. Exxon Gas Station, 6201 North Broad Street.

2. From on or about September 7, 2006, to on or about October 4, 2006, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

**RAHEEM MARSHALL**

conspired and agreed, with others known and unknown to the grand jury, to obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MARSHALL agreed to unlawfully take and obtain currency from the businesses, listed in paragraph 1, engaged in interstate commerce, in the presence of employees of those

businesses, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their control, all in violation of Title 18, United States Code, Section 1951(a), (b)(1) and (b)(3).

### **MANNER AND MEANS**

3. It was part of the conspiracy to rob gas stations and convenience stores at gunpoint and to steal money by use of force, threats of force and violence.

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### **OVERT ACTS**

In furtherance of the conspiracy, defendant RAHEEM MARSHALL, and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania ("PA"), and elsewhere:

#### **ARMED ROBBERY OF THE SUNOCO A-PLUS**

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On or about September 7, 2006:

1. Defendant RAHEEM MARSHALL and person # 1 drove to the vicinity of the Sunoco A-Plus, located in Philadelphia, where person # 1 held an employee of the Sunoco A-Plus at gunpoint, while defendant RAHEEM MARSHALL stole approximately \$2,000 in cash from two cash registers.

2. Defendant RAHEEM MARSHALL and person # 1 then fled from the Sunoco-A-Plus and subsequently divided up the \$2,000 in stolen cash between themselves.

#### **ARMED ROBBERY OF THE AMOCO GAS STATION**

On or about September 17, 2006:

3. Defendant RAHEEM MARSHALL and person # 1 drove to the vicinity of the Amoco Gas Station, located in Philadelphia, where defendant MARSHALL entered the Amoco Gas Station, pointed a handgun at an employee, and stole approximately \$700 in cash, while person # 1 remained outside as the look-out and getaway driver.

4. Defendant RAHEEM MARSHALL and person # 1 drove away from the gas station and divided up the \$700 in stolen money between themselves.

**ARMED ROBBERY OF THE COASTAL GAS STATION**

\_\_\_\_\_ On or about September 18, 2006:

5. Defendant RAHEEM MARSHALL and person # 1 drove to the vicinity of the Coastal Gas Station, located in Philadelphia, where person # 1 entered the gas station at gunpoint, and stole approximately \$525 in cash, while defendant MARSHALL remained outside as the lookout and getaway driver.

6. Defendant RAHEEM MARSHALL and person # 1 drove away from the gas station and divided up the \$525 in stolen money between themselves.

**ARMED ROBBERY OF THE SUNOCO GAS STATION**

On or about September 25, 2006:

7. Defendant RAHEEM MARSHALL and person # 1 drove to the vicinity of the Sunoco Gas Station, located in Philadelphia, PA, where defendant MARSHALL entered the Sunoco Gas Station, held an employee at gunpoint, and stole approximately \$1,200 in cash from the cashier, while person # 1 remained outside as the look-out and getaway driver.

8. Defendant RAHEEM MARSHALL and person # 1 drove away from the gas station and divided up the \$1,200 in stolen money between themselves.

**ARMED ROBBERY OF EXXON GAS STATION**

\_\_\_\_\_ On or about October 4, 2006 at approximately 1:08 p.m.:

9. Defendant RAHEEM MARSHALL and person # 1 and person # 2, known to the grand jury (person # 2) drove to the vicinity of the Exxon Gas Station, located in Philadelphia, where defendant MARSHALL and person # 1 entered the Exxon Gas Station, held an employee and the manager at gunpoint, and stole approximately \$1,200 in cash from the cashier, while person # 1 remained outside as the lookout and the

getaway driver.

10. Defendant RAHEEM MARSHALL, person # 1, and person # 3 then drove away from the gas station and divided up the \$1,200 in stolen money among themselves.

**ARMED ROBBERY OF AMOCO GAS STATION**

On or about October 4, 2006 at approximately 1:22 p.m.:

11. After the robbery of the Exxon Gas Station described above, defendant RAHEEM MARSHALL, person # 1, and person # 2 drove to the vicinity of the Amoco Gas Station, located in Philadelphia, PA, where defendant MARSHALL and person # 1 entered the gas station, pointed a handgun at a gas station employee, struck him over the head with the pistol, and stole approximately \$200 in cash, while person # 2 remained outside as the lookout and getaway driver.

12. After defendant RAHEEM MARSHALL, person # 1, and person # 2 drove away from the location, and person # 1 was dropped off, Philadelphia Police officers stopped the vehicle in which defendant MARSHALL and person # 2 were occupants and recovered a sawed-off .12 gauge shotgun and a stolen .22 caliber pistol.

All in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.a. of Count One of this indictment is incorporated here.
2. On or about September 7, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MARSHALL unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$2,000 in cash, belonging to the Sunoco A-Plus, from an employee, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, by pointing a semi-automatic handgun at an employee.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and

2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.a. of Count One of this indictment is incorporated here.
2. On or about September 15, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which defendant MARSHALL may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.b. of Count One of this indictment is incorporated here.
2. On or about September 17, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MARSHALL unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$700 in cash, belonging to the Amoco Gas Station, from an employee, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, by pointing a semi-automatic handgun at an employee.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and

2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.b. of Count One of this indictment is incorporated here.
- 2.. On or about September 17, 2006, in the Eastern District of Pennsylvania,

defendant

**RAHEEM MARSHALL**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which defendant MARSHALL may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference in interstate commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.



**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.c. of Count One of this indictment is incorporated here.
2. On or about September 18, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MARSHALL unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$525 in cash, belonging to the Coastal Gas Station, from an employee, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, by pointing a semi-automatic handgun at an employee.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and

2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.c. of Count One of this indictment is incorporated here.
2. On or about September 18, 2006, in the Eastern District of Pennsylvania,

defendants

**RAHEEM MARSHALL**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which defendant MARSHALL may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.d. of Count One of this indictment is incorporated here.
2. On or about September 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MARSHALL unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$1,200 in cash, belonging to the Sunoco Gas Station, from an employee, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, by pointing a semi-automatic handgun at an employee.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and

2.

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.d. of Count One of this indictment is incorporated here.
2. On or about September 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAHEEM MARSHALL**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which defendant MARSHALL may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.e. of Count One of this indictment is incorporated here.
2. On or about October 4, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MARSHALL unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$1,200 in cash, belonging to the Exxon Gas Station, from an employee, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, by pointing a handgun at an employee.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and

2.

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.e. of Count One of this indictment is incorporated here.
2. On or about October 4, 2006, in the Eastern District of Pennsylvania,

defendants

**RAHEEM MARSHALL**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which defendant MARSHALL may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.b. of Count One of this indictment is incorporated here.
2. On or about October 4, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MARSHALL unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$1,200 in cash, belonging to the Amoco Gas Station, from an employee, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, by pointing a handgun at an employee.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and

2.

**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.b. of Count One of this indictment is incorporated here.
2. On or about October 4, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM MARSHALL**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which defendant MARSHALL may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**PATRICK L. MEEHAN**  
**United States Attorney**